

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:

WELLPATH HOLDINGS, INC., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 24-90533 (ARP)

(Jointly Administered)

**THE STATUTORY UNSECURED CLAIMHOLDERS' COMMITTEE'S WITNESS AND  
EXHIBIT LIST FOR JANUARY 8, 2025 HEARING**

The Statutory Unsecured Claimholders' Committee (the "Committee") files this Witness and Exhibit List for the hearing to be held on January 8, 2025 at 1:00 p.m. (prevailing Central Time).

**Witnesses**

1. William Wicker, Financial Advisor to the Statutory Unsecured Claimholders' Committee, will offer fact and opinion testimony, and may offer expert opinion testimony (to the extent necessary);
2. Ryan Bouley, Financial Advisor to the Statutory Unsecured Claimholders' Committee, will offer fact and opinion testimony, and may offer expert opinion testimony (to the extent necessary);
3. Matthew Dundon, Financial Advisor to the Statutory Unsecured Claimholders' Committee, will offer fact and opinion testimony, and may offer expert opinion testimony (to the extent necessary);
4. Jeremy Barr, division president of Wellpath Recovery Solutions;
5. Timothy Dragelin, Senior Managing Director with FTI Consulting, Inc. and Interim Chief Financial Officer to the above-captioned debtors and debtors in possession (the "Debtors");
6. Christian Tempke, Investment Banker to the Debtors;

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<sup>1</sup> A complete list of the Debtors (as defined below) in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://dm.epiq11.com/Wellpath>. The Debtors' service address for these chapter 11 cases is 3340 Perimeter Hill Drive, Nashville, Tennessee 37211.

7. Jason Schoenholtz, Healthcare Investment Banker to the Debtors;
8. Any witness called or listed by any other party in interest;
9. Any witnesses necessary to authenticate an exhibit; and
10. Impeachment witnesses, as necessary.

### **Exhibits**

<b>Exhibit No.</b>	<b>Description</b>
1	<i>Stipulated and Agreed Amended Order (I) Approving the Bidding Procedures for the Sale of the Debtors' Assets, (II) Approving Entry Into a Stalking Horse Purchase Agreement for the Recovery Solutions Assets, (III) Authorizing the Recovery Solutions Expense Reimbursement, (IV) Authorizing Potential Selection of Stalking Horse Bidders for the Corrections Assets and Approving Related Corrections Asset(s) Bid Protections, (V) Establishing Related Dates and Deadlines, (VI) Approving the Form and Manner of Notice Thereof, (VII) Approving the Assumption and Assignment Procedures, and (VIII) Granting Related Relief [Docket No. 384].</i>
2	<i>Notice of Amended Timeline for Recovery Solutions / Consolidated Sale Transaction [Docket No. 563].</i>
3	<i>Declaration of William Wicker in Support of the Statutory Unsecured Claimholders' Committee's Emergency Motion for Relief from or, in the Alternative, for Alteration or Amendment of the Court's Order Approving Bidding Procedures for the Sale of Debtors' Assets. [Exhibit 1 to Docket No. 275].</i>
4	Debtors' Initial DIP Budget [Exhibit C to Exhibit 1 to Docket No. 58]
5	Any document or pleading filed with the Court in the above-captioned bankruptcy case.
6	Any exhibit necessary for impeachment purposes.
7	Any exhibit identified or offered by any other party.

### **Reservation of Rights**

The Committee reserves the right to call or to introduce one or more, or none, of the witnesses and exhibits listed above, and further reserves the right to supplement or otherwise amend this Witness and Exhibit List prior to the Hearing.

Respectfully submitted,

**STINSON LLP**

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*Proposed Counsel to the Statutory  
Unsecured Claimholders' Committee  
of Wellpath Holdings, Inc., et al.*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on January 6, 2025, the foregoing document was electronically filed with the court using the CM/ECF system, which sent notification to all parties of interest participating in the CM/ECF System.

/s/ Nicholas Zluticky

Nicholas Zluticky  
Counsel for the Committee